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**UNITED STATES BANKRUPTCY COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION**

**In re:**

**PG&E CORPORATION**

**-and-**

**PACIFIC GAS AND ELECTRIC  
COMPANY,**

**Debtors.**

- ☐ Affects PG&E Corporation
- ☐ Affects Pacific Gas and Electric Company
- ☒ Affects both Debtors

*\*All papers shall be filed in the Lead Case,  
No. 19-30088 (DM)*

Bankruptcy Case  
No. 19-30088 (DM)

Chapter 11  
(Lead Case)  
(Jointly Administered)

**MOTION OF THE OFFICIAL  
COMMITTEE OF TORT CLAIMANTS  
PURSUANT TO 11 U.S.C. §§ 105(a) AND  
501 AND FED. R. BANKR. P. 3003(c)  
FOR ENTRY OF AN ORDER  
EXTENDING THE BAR DATE**

Date: November 13, 2019  
Time: 9:30 a.m. (Pacific Time)  
Place: United States Bankruptcy Court  
Courtroom 17, 16th Floor  
San Francisco, CA 94102  
Objection Deadline: November 6, 2019

1 The Official Committee of Tort Claimants (the “TCC”), hereby submits this Motion  
2 (the “**Motion**”), pursuant to sections 105(a) and 501 of title 11 of the United States Code  
3 (the “**Bankruptcy Code**”) and Rule 3003(c) of the Federal Rules of Bankruptcy Procedure  
4 (the “**Bankruptcy Rules**”), for entry of an order granting the following relief:

- 5 1. An Order extending the bar date of October 21, 2019 to January 31, 2020, on the  
6 ground that a substantial number of fire victims have been unable to file proofs of  
7 claim in this case, because they erroneously believe they may not file claims, have  
8 not received notice of the case, and/or are physically, mentally and/or emotionally  
9 impaired as a result of the trauma, injuries and living conditions caused by the  
10 Debtors’ fires.
- 11 2. In the alternative, an Order extending the bar date of October 21, 2019 to December  
12 5, 2019; appointing an independent Court-Appointed Expert pursuant to Fed. R.  
13 Evid. 706 to investigate the extent to which fire victims have not received notice of  
14 the current bar date, erroneously believe they may not file claims in this case, and/or  
15 are physically, mentally or emotionally impaired from filing claims by the current  
16 or extended bar date; and extending the bar date past December 5, 2019, up through  
17 a maximum extension of January 31, 2020, to the extent the Court determines  
18 following receipt of the Court-Appointed Expert’s report that there is cause for such  
19 a further extension.
- 20 3. An Order appointing a Court-Appointed Fiduciary to educate the fire victims and to  
21 assist the fire victims to file claims, to the extent the Fiduciary determines the  
22 victims are under physical, mental or emotional circumstances that impair their  
23 ability to file claims without assistance.

24 In support of the Motion, the TCC submits the Declarations of Richard Barton (the “**Barton**  
25 **Declaration**”), Mikko Bojarsky (the “**Bojarsky Declaration**”), Lynda Bradway (the “**Bradway**  
26 **Declaration**”), Nathaniel Brown (the “**Brown Declaration**”), Samantha Chocktoot (the  
27 “**Chocktoot Declaration**”), Elizabeth Davis (the “**Davis Declaration**”), Marjorie Everidge (the  
28 “**Everidge Declaration**”), Brooke Gardner (the “**B Gardner Declaration**”), Mary Gardner

1 (the “**M Gardner Declaration**”), Patricia Garrison (the “**Garrison Declaration**”), Ryan Mooney  
2 (the “**Mooney Declaration**”), Dr. Scheherazade Shamsavari (the “**Shamsavari Declaration**”),  
3 Steven Thomas (the “**Thomas Declaration**”), Roger K. Pitman, M.D. (the “**Pitman Declaration**”),  
4 James Drinkhall (the “**Drinkhall Declaration**”) and Robert A. Julian (the “**Julian Decl.**”) filed  
5 contemporaneously herewith. A proposed form of order granting the relief requested herein is  
6 attached hereto as **Exhibit A** (the “**Proposed Order**”).  
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8 Dated: October 18, 2019

9 BAKER & HOSTETLER LLP

10 By: /s/ Robert Julian  
11 Robert Julian

12 *Counsel for The Official Committee of Tort*  
13 *Claimants*  
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